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Live Nation Entertainment, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JUICE ENTERTAINMENT, LLC, THOMAS
DORFMAN, AND CHRIS BARRETT,
Plaintiffs,

vs.

LIVE NATION ENTERTAINMENT, INC.,
Defendant.

Civil Action No. 11-07318 (WHW) (MCA)

Oral Argument Requested

**CERTIFICATION OF IAN S. MARX
IN SUPPORT OF DEFENDANT LIVE
NATION ENTERTAINMENT, INC.'S
MOTION FOR SUMMARY
JUDGMENT**

I, Ian S. Marx, declare that I am a Shareholder of Greenberg Traurig, LLP, attorneys for Defendant Live Nation Entertainment, Inc. I make this certification on the basis of personal knowledge and my review of the documents discussed below and in support of Defendant's motion for summary judgment, pursuant to Fed. R. Civ. P. 56.

1. True and correct copies of excerpts from the deposition transcript of Christopher Barrett, dated November 19, 2013, are attached as Exhibit 1.
2. True and correct copies of excerpts from the deposition transcript of Alan Sacks, dated July 18, 2013, are attached as Exhibit 2.
3. True and correct copies of excerpts from the deposition transcript of Thomas Dorfman, dated July 18, 2013, are attached as Exhibit 3.

4. True and correct copies of excerpts from the deposition transcript of Al Dorso, dated July 16, 2013, are attached as Exhibit 4.

5. A true and correct copy of a March 7, 2011 Agreement, which was attached as Exhibit B to the Amended Complaint, is attached as Exhibit 5.

6. A true and correct copy of the Electric Daisy Carnival 2011 schedule, which can be found at the Electric Daisy Carnival website (web address: http://electricdaisycarnival.com/archive/edc_2011/LasVegas/info.php), is attached as Exhibit 6.

7. A true and correct copy of an email dated February 3, 2011 from John DiMatteo to Alan Sacks, which was produced by Plaintiffs during discovery, is attached as Exhibit 7.

8. A true and correct copy of an email chain dated October 11-15, 2010 among Paul Potter, Thomas Dorfman, Christopher Barrett and Alan Sacks, which was produced by Plaintiffs during discovery, is attached as Exhibit 8.

9. A true and correct copy of Paul Potter emails dated November 24 and 26, 2010, which were produced by Plaintiffs during discovery, are attached as Exhibit 9.

10. A true and correct copy of an email dated December 17, 2010, with a Christopher Barrett/Paul Potter email chat, which was produced by Plaintiffs during discovery, is attached as Exhibit 10.

11. True and correct copies of excerpts from the deposition transcript of John DiMatteo, dated July 17, 2013, are attached as Exhibit 11.

12. A true and correct copy of an engagement letter dated December 1, 2010, which was produced by Plaintiffs during discovery, is attached as Exhibit 12.

13. True and correct copies of excerpts from the deposition transcript of Vito Bruno, dated February 4, 2014, are attached as Exhibit 13.

14. A true and correct copy of a Promissory Note between John Sandberg, Thomas Dorfman, Christopher Barrett, Juice Entertainment, and Georgianne and John Chiusolo, dated February 16, 2011, which was produced by Plaintiffs during discovery, is attached as Exhibit 14.

15. A true and correct copy of a New Jersey Department of Treasury, Division of Revenue, Certificate of Formation, dated May 4, 2009, is attached as Exhibit 15.

16. A true and correct copy of an email dated March 27, 2011, from John Sandberg to Christopher Barrett and Thomas Dorfman, which was produced by Plaintiffs during discovery, is attached as Exhibit 16.

17. A true and correct copy of a letter from Provident Bank dated March 1, 2011, which was produced by Plaintiffs during discovery, is attached as Exhibit 17.

18. A true and correct copy of a letter purporting to be from Provident Bank dated March 1, 2011, which was produced by Plaintiffs during discovery, is attached as Exhibit 18.

19. A true and correct copy of a document entitled "Seized Illegal Sandy Charity Money Still in Limbo: Sparta couple who started the charity spent summer in Costa Rica" that can be viewed on the NJ News website (web address: <http://www.app.com/article/20131213/NJNEWS2003/312130107/sandy-charities>), is attached as Exhibit 19.

20. A true and correct copy of an email dated January 26, 2011 from John DiMatteo to Paul Morris, which was produced by Plaintiffs during discovery, is attached as Exhibit 20.

21. A true and correct copy of an email dated February 16, 2011 from John DiMatteo to Paul Morris, which was produced by Plaintiffs during discovery, is attached as Exhibit 21.

22. A true and correct copy of an email chain dated February 21-22, 2011 from John DiMatteo to Steve Goodgold, which was produced by Plaintiffs during discovery, is attached as Exhibit 22.

23. A true and correct copy of an email chain dated February 3, 2011 from John DiMatteo to Joel Zimmerman and others, which was produced by Plaintiffs during discovery, is attached as Exhibit 23.

24. A true and correct copy of an email dated February 22, 2011 from John DiMatteo to Thomas Dorfman, Christopher Barrett and others, which was produced by Plaintiffs during discovery, is attached as Exhibit 24.

25. A true and correct copy of the March 7, 2011 Request for Extension, which was attached as Exhibit C to the Amended Complaint, is attached as Exhibit 25.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this Certification was executed this 17 day of October, 2016 in Florham Park, New Jersey.



IAN S. MARX

Dated: October 17, 2016